

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

ORIGINAL

DOCKET FILE COPY ORIGINAL

In the Matter of )  
)  
Billed Party Preference )  
for 0+ InterLATA Calls )  
)  
Disclosures by Operator )  
Service Providers Serving )  
Public Phones )

CC Docket No. 92-77

RM-8606

RECEIVED

APR 12 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

COMMENTS

MCI Telecommunications Corporation (MCI) hereby  
comments on the (1) ex parte communication filed jointly by  
a number of parties<sup>1</sup> in the Billed Party Preference (BPP)  
proceeding (the Joint Petitioners), and (2) petition for  
rulemaking filed by the National Association of Attorneys  
General (NAAG) concerning operator services disclosures.

JOINT PETITIONERS' EX PARTE COMMUNICATION

The Joint Petitioners argue that the Commission should  
enact a "rate ceiling" for operator services instead of  
mandating the implementation of BPP because the latter is  
not cost-justified; will take several years to implement;  
and is broadly opposed. Moreover, they argue, "[t]he  
unblocking of access codes, coupled with the branding of

---

<sup>1</sup> The ex parte communication (Ex Parte Communication)  
was filed by the Competitive Telecommunications Association,  
Bell Atlantic, BellSouth Telecommunications, NYNEX, US West,  
American Public Communications Council, MFS Communications  
Company, Inc. and Teleport Communications Group, all  
entities with differing reasons to deny consumer choice in  
the operator services area.

No. of Copies rec'd 024  
List A B C D E

calls and the vast sums spent on consumer education, leave rates as the only remaining area of concern"<sup>2</sup> with respect to operator services, which concern can be addressed and resolved with a rate ceiling.

MCI strongly disagrees with the Joint Petitioners' self-serving claims concerning the "facts" developed in the BPP proceeding and it strongly opposes the proposed rate ceiling alternative. In its Comments and Reply Comments,<sup>3</sup> MCI demonstrated that the Commission's cost/benefit analysis, in which the Commission tentatively concluded that the benefits of BPP outweigh the costs, is correct and that the cost estimates to implement BPP submitted by the local exchange carriers (LECs) are too high. In addition, although Joint Petitioners argue that many industry participants oppose BPP, they fail to mention that consumers filed comments in support of BPP because it provides consumer and competitive benefits that simply are not achievable through any other means.

The Joint Petitioners also are incorrect in their claim that "price gouging" is the only remaining area of concern in the operator services market. The NAAG petition demonstrates that consumers still cannot access their carrier-of-choice because access code dialing is blocked.

---

<sup>2</sup> Ex Parte Communication at 2.

<sup>3</sup> See MCI's Comments and Reply Comments, CC Docket No. 92-77, filed on August 1, 1994 and September 14, 1994, respectively.

In any event, consumers want to be able to access their preferred carrier with the ease and convenience of 0+ dialing. And, the Commission recently initiated a proceeding on operator services, in part, because consumers still are not aware of the identity of the presubscribed OSP at aggregator locations due to failures to post accurate information. A rate ceiling will not address these problems.

Moreover, the rate ceiling alternative, MCI submits, would not eliminate price gouging and would be costly and burdensome to administer. The Commission would have to conduct a proceeding to prescribe the rate that would establish the ceiling -- an activity that clearly would be contrary to the Commission's policy of reducing regulation by reliance upon marketplace competition. And, any rate ceiling imposed by the Commission likely would result in a court appeal -- thus, further adding to the Commission's regulatory burden and costs. In addition, for a rate ceiling to have any positive effect, the Commission would have to enforce it. In this regard, the Florida Commission's experience is instructive in that it conducted eleven proceedings and discovered over \$2 million in overcharges "[d]espite implementation of [its] rate cap...."<sup>4</sup>

A rate ceiling also would not necessarily work to

---

<sup>4</sup> Florida Reply Comments, CC Docket No. 92-77, at 2.

benefit consumers. As an initial matter, since OSPs do not really compete for the consumer's (as distinct from the phone or property owner's) business, they would have no incentive to charge a rate lower than the ceiling. Thus, in effect, the "rate ceiling" likely would end up being a "rate floor" as well. In addition, according to certain OSPs, their costs of providing service are higher than those of MCI, AT&T and Sprint and, possibly, any rate ceiling. OSPs that demonstrated higher costs -- through Commission proceedings -- would be entitled to charge higher rates in order to recover those costs.<sup>5</sup> As a result, consumers still might be faced with the prospect of being charged rates higher than their preferred carrier's rates -- but, those rates would be sanctioned by the Commission. Moreover, to avoid those rates, consumers still would have to dial access codes which is not the preferred access method and is not always possible due to blocking.

The fact that the Commission has conducted continuous rulemaking and enforcement proceedings concerning operator service abuses throughout the past 4 1/2 years -- with no less than three proceedings since the beginning of this year -- demonstrates that no amount of regulation or consumer

---

<sup>5</sup> It seems elementary that, as a matter of law, the Commission could not establish a rate that did not permit a carrier to recover its costs in providing service. Indeed, it is better left to a competitive market -- one that will come to fruition with the implementation of BPP -- to force inefficient and high-cost service providers from the marketplace.

education will prevent abuses because the current system creates the wrong incentives. OSPs compete to win business by becoming the presubscribed carrier through paying-off premise owners with "commissions" for certain traffic. Some OSPs recover those commission payments by charging outrageously high rates to consumers. And, some aggregators maximize their commission payments by blocking access to alternative OSPs. These "incentives" will not be overcome by rate ceilings because that approach will not reach the core problem.

The only way to foreclose abuse is to change the incentives, really, modifying behavior, by implementation of BPP, which will encourage OSPs to redirect their competitive efforts toward consumers. After all, consumer needs and wants should be the driving force in a competitive industry. Thus, the Commission must decide if it intends to protect consumers and encourage true competition by mandating BPP or if it intends to continue to protect certain industry participants at the expense of consumers. In light of the clear direction in the Communications Act of 1934, as amended, and the Commission's long-standing policy to promote competition, the Commission, MCI submits, must reject the Joint Petitioners' proposal and order the implementation of BPP.

THE NAAG PETITION

The Commission also seeks comment on the NAAG's request that OSPs be required to provide additional information to consumers who use payphones or other public phones. Specifically, NAAG urges the Commission to adopt a requirement that OSPs whose rates are not at or below dominant carrier rates provide a statement during the call such as the following:

"This may not be your regular telephone company and you may be charged more than your regular telephone company would charge for this call. To find out how to contact your regular telephone company call 1-800-555-1212."

NAAG believes this additional disclosure is necessary because operator service abuses continue in the marketplace. Thus, the NAAG states that consumers are charged exorbitant rates by unknown carriers; access-code blocking still occurs; aggregators do not post the identity of the OSP on their phones; and some OSPs do not clearly brand or provide rate information in a timely fashion.

The NAAG's proposal would not prevent these abuses, in MCI opinion. Under Section 201(b) of the Communications Act of 1934, OSPs are required to charge "reasonable rates" and, under existing rules, they are required to disclose those rates on request. It seems likely that OSPs which fail to comply with these existing requirements would also fail to comply with the NAAG's proposed requirement. And, for OSPs which follow the current requirements and charge reasonable

rates, the NAAG's proposal would impose an additional and unnecessary regulatory burden that would increase call set-up time and costs which, ultimately, would lead to higher rates for consumers.

Finally, the NAAG's disclosure requirement would not, as suggested, "foster price competition for users of public phone services" or "provide consumers with a fairer opportunity to make an informed purchase of OSP services." Rather, these objectives or goals, sound as they are, will be achieved only when consumers are guaranteed the ability to access their carrier-of-choice through the implementation of BPP.

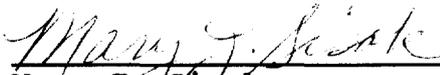
CONCLUSION

Based on the foregoing, MCI urges the Commission to reject the Joint Petitioners' Ex Parte Communication and the NAAG's petition and, instead, order the prompt implementation of BPP.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:



Mary J. Sisak  
Donald J. Elardo  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 887-2605

Dated: April 12, 1995

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 12th day of April 1995, copies of the foregoing "COMMENTS" in CC Docket No. 92-77 and RM 8606 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.

  
\_\_\_\_\_  
Vernell V. Garey

\*--HAND DELIVERED

**Mark Nadel\***  
**Common Carrier Bureau**  
**Federal Communications Commission**  
**1919 M Street, N.W., Room 514**  
**Washington, D.C. 20554**

**George A. Christenberry, Jr.**  
**Deputy Commissioner**  
**Department of Administrative Services**  
**Telecommunications Division**  
**200 Piedmont Avenue**  
**Suite 1402, West Tower**  
**Atlanta, GA 30334-5540**

**Bob Starks**  
**Representative, 38th District**  
**Florida House of Representatives**  
**1312 Palmetto Avenue**  
**Winter Park, FL 32789**

**Richard M. Walsh**  
**Special Assistant for Computer**  
**Information Systems**  
**Office of Administration**  
**Commonwealth of Pennsylvania**  
**Governor's Office**  
**204 Finance Building**  
**Harrisburg, PA 17120**

**Robert K. Johnson**  
**Deputy Consumer Counselor**  
**Indiana Office of Utility Consumer Counselor**  
**Indiana Government Center**  
**N501 100 North Senate Avenue**  
**Indianapolis, IN 46204**

**Irwin A. Popowsky**  
**Consumer Advocate**  
**Pennsylvania Office of Consumer Advocate**  
**1425 Strawberry Square**  
**Harrisburg, PA 17120**

**Eileen E. Huggard, Esq.**  
**New York City Department of**  
**Telecommunications and Energy**  
**75 Park Place, Sixth Floor**  
**New York, NY 10007**

**Perry R. Eichor**  
**Secretary**  
**South Carolina Jail Administrators Association**  
**P.O. Box 10171**  
**Greenville, SC 29603**

**Barney C. Parrella**  
**Senior Vice President**  
**Economics and International Affairs**  
**Airports Association Council**  
**International, North America**  
**1220 19th Street, N.W.**  
**Suite 200**  
**Washington, D.C. 20036**

**Ian D. Volner**  
**Cohn and Marks**  
**Suite 600**  
**1333 New Hampshire Avenue, N.W.**  
**Washington, D.C. 20036**  
**Of Counsel:**  
**Airports Association Council**  
**International, North America**

**Alan J. Thiemann**  
**Taylor Thiemann & Aitken**  
**908 King Street, Suite 300**  
**Alexandria, VA 22314**  
**Attorney for the National**  
**Association of Convenience Stores**

**Keith J. Roland**  
**Roland, Fogel, Koblenz & Carr**  
**One Columbia Place**  
**Albany, NY 12207**  
**Attorney for the Independent Payphone**  
**Association of New York, Inc.**

John F. Dodd  
 Brad I. Pearson  
 Smith, Gill, Fisher & Butts  
 One Kansas City Place  
 1200 Main Street, 35th Floor  
 Kansas City, MO 64105-2152  
 Attorneys for the Independent  
 Network, Inc. and American  
 Telemanagement, Inc.

Gary Joseph  
 Vice President - Communications  
 National Brands, Inc.  
 d/b/a Sharenet Communications Company  
 4633 West Polk Street  
 Phoenix, AZ 85043

Benjamin J. Griffin  
 Lynn E. Shapiro  
 Reed Smith Shaw & McClay  
 1200 18th Street, N.W.  
 Washington, D.C. 20036  
 Attorneys for South Carolina Division  
 of Information Resources Management

Stephen G. Kraskin  
 2120 L Street, N.W., Suite 300  
 Washington, D.C. 20037  
 Attorney for U.S. Intelco Networks, Inc.

Rick L. Anthony  
 Executive Vice President  
 Quest Communications Corporation  
 8829 Bond Street  
 Shawnee Mission, KS 66214-1707

Maurice D. Murphy  
 Associate Director  
 Harvard University  
 Office of Information Technology  
 10 Ware Street  
 Cambridge, MA 02138

Veronica M. Ahern  
 Nixon, Hargrave, Devans & Doyle  
 One Thomas Circle, Suite 800  
 Washington, D.C. 20005  
 Attorney for the Illinois Department  
 of Central Management Services, Bureau of  
 Communications & Computer Services

Scott R. O'Donnell  
 Director  
 Department of Aviation  
 County of Allegheny  
 Room M 134, Terminal Building  
 Greater Pittsburgh International Airport  
 Pittsburgh, PA 15231

John B. Mow  
 President  
 Chief Executive officer  
 Advanced Business Communications  
 4801 Spring Valley  
 Suite 105A  
 Dallas, TX 75244

Randolph J. May  
 Elizabeth C. Buckingham  
 Sutherland, Asbill & Brennan  
 1275 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004-2404  
 Attorneys for the Advanced Technologies  
 Cellular Telecommunications, Inc.

William M. Barvick  
 Bar Number 17893  
 231 Madison Street  
 Jefferson City, MO 65101  
 Attorney for Midwest Independent Coin  
 Payphone Association

**Mark J. Angell**  
 Vice President  
 Universal Technology & Communications  
 Corporation  
 10940 Laureate Drive, Suite 8300  
 San Antonio, TX 78249-3343  
**Thomas P. Engel**  
 Director of Airports  
 County of Sacramento  
 Department of Airports  
 6900 Airport Boulevard  
 Sacramento, CA 95837

**Krys T. Bart**  
 Assistant Director  
 City of Fresno  
 2401 N. Ashley Way  
 Fresno, CA 93727-1504

**Robert N. Broadbent**  
 Director  
 Department of Aviation  
 McCarran International Airport  
 P.O. Box 11005  
 Las Vegas, NV 89111

**G.A. Barron, Jr.**  
 President/General Manager  
 Portland 76 Auto/Truck Plaza Inc.  
 21856 Bents Road, N.E.  
 1-5, Exit 278  
 Aurora, OR 97002

**Gerald K. Olson, A.A.E.**  
 Cheyenne Airport Manager  
 Cheyenne Airport  
 P.O. Box 2210  
 200 East 8th Avenue  
 Cheyenne, WY 82003-2210

**Eddie F. Storer**  
 Airport Manager  
 Natrona County International Airport  
 8500 Fuller Street  
 Casper, WY 82604-1697

**Patricia A. Simmons**  
 Telecommunications Officer  
 Office of Systems and Computing Services  
 Renne Library Basement  
 Montana State University  
 Bozeman, MT 59717-0324

**Louis E. Miller**  
 Director of Airports  
 Salt Lake City Airport Authority  
 AMF Box 22084  
 Salt Lake City, UT 84122

**C.M. Armour, President**  
 Southeast Chapter, American Association  
 of Airport Executives (SEC AAAE)  
 Southwest Georgia Regional Airport  
 3905 Newton Road  
 Albany, GA 31707

**Douglas N. Owens**  
 4705 16th Street, N.E.  
 Seattle, WA 98105  
 Attorney for Northwest Pay Phone Association

**Stanley F. Bates**  
 Assistant Director  
 Arizona Department of Corrections  
 1601 West Jefferson Street  
 Phoenix, AZ 85007-3003

**O. Lane McCotter**  
 Executive Director  
 Utah Department of Corrections  
 6100 South 300 East  
 Murray, UT 84107

Albert H. Kramer  
 Robert F. Aldrich  
 Helen M. Hall  
 Keck, Mahin & Cate  
 1201 New York Avenue, N.W.  
 Washington, D.C. 20005-3919  
 Attorneys for American Public  
 Communications Council, North American  
 Telecommunications Association

Richard G. Kiekbusch  
 President  
 American Jail Association  
 1000 Day Road, Suite 100  
 Hagerstown, MD 21740

Bern E. Case, A.A.E.  
 Director of Aviation  
 Lubbock International Airport  
 Route 3, Box 389  
 Lubbock, TX 79401

Jerry L. McMichael, A.A.E.  
 Executive Vice President  
 Finance and Administration  
 Memphis-Shelby County Airport Authority  
 Office Memphis International Airport  
 P.O. Box 30168  
 Memphis, TN 38130-0168

Robert H. Waddle, AAE  
 Executive Director  
 Columbia Metropolitan Airport  
 P.O. Box 280037  
 Columbia, SC 29228-0037

John W. Priest  
 Chairman & Chief Executive Officer  
 ComCentral Corp.  
 2150 Whitfield Industrial Way  
 Sarasota, FL 34243-4046

Richard L. Goldberg  
 Graham & James  
 One Maritime Plaza, Third Floor  
 San Francisco, CA 94111  
 Attorney for California Payphone Association

John J. Huber, Counsel  
 Petroleum Marketers Association of America  
 1130 Vermont Avenue, N.W., Suite 1130  
 Washington, D.C. 20005-3523

Pamela J. Brandon, Division Administrator  
 Wisconsin Department of Corrections  
 149 E. Wilson Street  
 P.O. Box 7925  
 Madison, WI 53707

Erin E. Ostler  
 Vice President  
 Strategic Alliances, Inc.  
 2353 Rice Street, Suite 106  
 Roseville, MN 55113

Robert C. Dickhaus  
 President  
 Telephone Operating Systems, Inc.  
 P.O. Box 888048  
 Atlanta, GA 30356-0048

John W. Priest  
 Chairman & Chief Executive Officer  
 Teltronics, Inc.  
 2150 Whitfield Industrial Way  
 Sarasota, FL 34243-4046

Brent A. Kitchen  
 Airports Director  
 Tulsa Airport Authority  
 Tulsa International Airport  
 P.O. Box 581838  
 Tulsa, OK 74158

Emily Regnier  
 Airport Properties Department  
 Oakland International Airport  
 Port of Oakland  
 530 Water Street  
 Jack London's Waterfront  
 P.O. Box 2064  
 Oakland, CA 94604-2064

Vernell Sturns  
 Executive Director  
 Dallas/Fort Worth International Airport  
 P.O. Drawer DFW  
 Dallas/Fort Worth Airport, TX 75261

Jean L. Kiddo  
 Ann P. Morton  
 Swidler & Berlin, Chtd.  
 3000 K Street, N.W., Suite 300  
 Washington, D.C. 20007  
 Attorneys for the Greater Orlando  
 Aviation Authority

Hugh J. Macbeth  
 Manager, Telecommunications  
 Greater Orlando Aviation Authority  
 One Airport Blvd.  
 Orlando, FL 32827-4399

Steve Schude  
 President  
 Advanced Payphoen Systems, Inc.  
 535 W. Iron Avenue, Suite 122  
 Mesa, AZ 85210

Nanci Adler  
 Technologies Management, Inc.  
 163 E. Morse Boulevard  
 Winter Park, FL 32789  
 Consultant to Advanced Payphone Systems

Robert C. Whit  
 Executive Director  
 Airport Authority of Washoe County  
 Reno Stead Airport  
 Box 12490  
 Reno, NV 89510

Douglas E. Neel  
 Vice President  
 Regulatory Affairs  
 MessagePhone, Inc.  
 5910 N. Central Expressway  
 Suite 1575  
 Dallas, TX 75206

Rowland L. Curry  
 Director  
 Telephone Utility Analysis Division  
 Public Utility Commission of Texas  
 7800 Shoal Creek Boulevard  
 Austin, TX 78757

Colleen M. Dale  
 Senior Counsel  
 Missouri Public Service Commission  
 P.O. Box 360  
 Jefferson City, MO 65102

Ellen M. Averett  
 Veronica A. Smith  
 John F. Povilaitis  
 P.O. Box 3265  
 G-28, North Office Building  
 Harrisburg, PA 17105-3265  
 Attorneys for the Pennsylvania Public  
 Utility Commission

Ronald G. Choura, Supervisor  
 Olga Lozano, Analyst  
 Telecommunications Section  
 Policy Division  
 Michigan Public Service Commission  
 P.O. Box 30221  
 Lansing, MI 48909-7721

Darrell S. Townsley  
 Special Assistant Attorney General  
 Illinois Commerce Commission  
 180 North LaSalle Street  
 Suite 810  
 Chicago, IL 60601

James R. Monk, Chairman  
 Indiana Utility Regulatory Commission  
 302 W. Washington Street  
 Suite E306  
 Indianapolis, IN 46204

James B. Gainer, Section Chief  
 Ann E. Henkener  
 Assistant Attorney General  
 Public Utilities Section  
 180 East Broad Street  
 Columbus, OH 43266

Cheryl L. Parrino, Chairman  
 Public Service Commission of Wisconsin  
 4802 Sheboygan Avenue  
 P.O. Box 7854  
 Madison, WI 53707

Brian J. Kinsella  
 Thomas F. Youngblood  
 American Hotel & Motel Association  
 1201 New York Avenue, N.W.  
 Washington, D.C. 20005-3931

William E. Wyrrough, Jr.  
 Associate General Counsel  
 Florida Public Service Commission  
 101 East Gaines Street  
 Tallahassee, FL 32399-0850

Josephine S. Trubek  
 Rochester Tel Center  
 180 South Clinton Avenue  
 Rochester, NY 14646-0700  
 Attorney for the RCI Long Distance, Inc.

Rochelle D. Jones  
 Director-Regulatory  
 227 Church Street, 4th Floor  
 New Haven, CT 065104

Robert M. Lynch  
 Richard C. Hartgrove  
 John Paul Walters, Jr.  
 One Bell Center, Room 3520  
 St. Louis, MO 63101  
 Attorneys for Southwestern Bell  
 Telephone Company

Leon M. Kestenbaum  
 Jay C. Keithley  
 H. Richard Juhnke  
 1850 M Street, N.W., 11th Floor  
 Washington, D.C. 20036  
 Attorneys for Sprint Corporation

Craig T. Smith  
 P.O. Box 11315  
 Kansas City, MO 64112  
 Attorney for Sprint Corporation

Mary McDermott  
 Vice President & General Counsel  
 Linda Kent  
 Associate General Counsel  
 900 15th Street, N.W., Suite 800  
 Washington, D.C. 20006-2105  
 Attorneys for the United States Telephone  
 Association

Lawrence E. Sarjeant  
 Randall S. Coleman  
 1020 19th Street, N.W., Suite 700  
 Washington, D.C. 20036  
 Attorneys for U.S. West Communications, Inc.

Walter Steimel, Jr.  
 Fish & Richardson  
 601 13th Street, N.W.  
 5th Floor North  
 Washington, D.C. 20005  
 Attorneys for Pilgrim Telephone, Inc.

James P. Tuthill  
 Nancy C. Woolf  
 140 New Montgomery Street  
 Room 1523  
 San Francisco, CA 94105  
 Attorneys for Pacific Bell and Nevada Bell

James L. Wurtz  
 1275 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004  
 Attorney for Pacific Bell and Nevada Bell

Lisa M. Zaina  
 General Counsel  
 Organization for the Protection and  
 Advancement of Small Telephone Companies  
 21 Dupont Circle, N.W., Suite 700  
 Washington, D.C. 20036

Patrick A. Lee  
 Edward E. Niehoff  
 120 Bloomingdale Road  
 White Plains, NY 10605  
 Attorneys for New York Telephone  
 Company and New England Telephone and  
 Telegraph Company

Gail L. Polivy  
 1850 M Street, N.W.  
 Suite 1200  
 Washington, D.C. 20036  
 Attorney for GTE Service Corporation  
 and its affiliated GTE domestic telephone  
 operating companies

Richard E. Wiley  
 Danny E. Adams  
 Brad E. Mutschelknaus  
 Wiley, Rein & Fielding  
 1776 K Street, N.W.  
 Washington, D.C. 20006  
 Attorneys for Competitive  
 Telecommunications Association

Genevieve Morelli  
 Vice President and General Counsel  
 Competitive Telecommunications Association  
 1140 Connecticut Avenue, N.W.  
 Suite 220  
 Washington, D.C. 20036

Frank M. Panek  
 John T. Lenahan  
 Larry A. Peck  
 2000 W. Ameritech Center Drive  
 Room 4H86  
 Hoffman Estates, IL 60196-1025

John M. Goodman  
 Edward D. Young, III  
 1710 H Street, N.W.  
 Washington, D.C. 20006  
 Attorneys for the Bell Atlantic  
 Telephone Companies

M. Robert Sutherland  
 Richard M. Sbaratta  
 Helen A. Shockey  
 Suite 1800  
 1155 Peachtree Street, N.W.  
 Atlanta, GA 30367-6000

Debra L. Lagapa  
 Mary K. O'Connell  
 Morrison & Foerster  
 2000 Pennsylvania Avenue, N.W.  
 Suite 5500  
 Washington, D.C. 20006  
 Attorneys for MasterCard International  
 Incorporated and VISA U.S.A., Inc.

Mark C. Rosenblum  
 Robert J. McKee  
 Richard H. Rubin  
 295 North Maple Avenue  
 Room 3244J1  
 Basking Ridge, NJ 07920  
 Attorneys for American Telephone and  
 Telegraph Company

Roy L. Morris  
 Deputy General Counsel  
 Allnet Communications Services, Inc.  
 1990 M Street, N.W.  
 Suite 500  
 Washington, D.C. 20036

Randolph J. May  
 David A. Gross  
 Elizabeth C. Buckingham  
 Sutherland, Asbill & Brennan  
 1275 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004-2404

Jean L. Kiddoo  
 Ann P. Morton  
 Swidler & Berlin, Chtd.  
 3000 K Street, N.W., Suite 300  
 Washington, D.C. 20007  
 Attorneys for Cleartel  
 Communications, Inc., Com Systems, Inc.,  
 International Pacific, Inc. and Teltrust  
 Communications Services, Inc.

Greg Casey  
 Senior Vice President  
 Regulatory Affairs  
 Jane A. Fisher, Director  
 Federal Regulatory (Acting)  
 International Telecharge, Inc.  
 6706 Democracy Boulevard  
 Bethesda, MD 20817

Brad Mutschelknaus  
 Danny E. Adams  
 Rachel J. Rothstein  
 Wiley, Rein & Fielding  
 1776 K Street, N.W.  
 Washington, D.C. 20006  
 Attorneys for International Telecharge, Inc.  
 and U.S. Long Distance, Inc.

Judith St. Ledger-Roty  
 Michael R. Wack  
 Reed Smith Shaw & McClay  
 1200 18th Street, N.W.  
 Washington, D.C. 20036  
 Attorneys for Intellicall, Inc.

**John A. Ligon**  
**Law Office of John Ligon**  
 128 Mount Hebron Avenue  
 P.O. Box 880  
 Upper Montclair, NJ 07043  
 Attorney for Comtel Computer Corporation

**Steven J. Hogan**  
 President and CEO  
 LinkUSA  
 210 2nd Street, S.E., Suite 400  
 Cedar Rapids, IA 52401

**James D. Heflinger**  
 Vice President and General Counsel  
 LiTel Telecommunications Corporation  
 d/b/a LCI International  
 4650 Lakehurst Court  
 Dublin, OH 43017

**Randall B. Lowe**  
 Charles H. N. Kallenbach  
 Jones, Day, Reavis & Pogue  
 1450 G Street, N.W.  
 Washington, D.C. 20005-2088  
 Attorneys for One Call Communiciaons, Inc.  
 d/b/a OPTICOM

**Mitchell F. Brecher**  
 Dow, Lohnes & Albertson  
 1255 Twenty-Third Street, N.W.  
 Washington, D.C. 20037  
 Attorneys for PhoneTel Technologies, Inc.

**Mark W. Kelly**  
 Vice Chairman/President  
 Thomas W. Wilson  
 Sr. Vice President  
 Strategic Planning  
 Polar Communications Corporation  
 300 Corporate Center Drive  
 Manalapan, NJ 07726

**Paul C. Besozzi**  
**Besozzi & Gavin**  
 1901 L Street, N.W., Suite 200  
 Washington, D.C. 20036  
 Attorney for Polar Communications  
 Corporation

**W. Audie Long**  
 Senior Vice President  
 Legal & Regulatory  
 U.S. Long Distance, Inc.  
 9311 San Pedro  
 Suite 300  
 San Antonio, TX 78216

**Charles P. Miller**  
 General Counsel  
 Value-Added Communications, Inc.  
 1901 So. Meyers Road, Suite 530  
 Oakbrook Terrace, IL 60181

**Douglas E. Neel**  
 Vice President  
 Regulatory Affairs  
 MessagePhone, Inc.  
 5910 N. Central Expressway  
 Suite 1575  
 Dallas, TX 75206

**Jack R. McFadden**  
 Director, Telecommunications Policy  
 and Planning  
 Office of Information Resources  
 State of Tennessee Department of Finance and  
 Administration  
 598 James Robertson Parkway  
 Nashville, TN 37243-0560

**Walter Steimel, Jr.**  
 Fish & Richardson  
 601 13th Street, N.W.  
 5th Floor North  
 Washington, D.C. 20005  
 Attorneys for Pilgrim Telephone, Inc.

**William D. Catoe**  
President  
South Carolina Correctional Association  
P.O. Box 210603  
Columbia, SC 29221

**Laurie D. Morse**  
Property Manager  
Monterrey Peninsula Airport District  
P.O. Box 550  
Monterey, CA 93940

**James D. Dronsfield**  
Director, Telecommunications  
Duke University  
106 Science Drive  
Room 129 Tel-com  
Durham, NC 27706

**Angela Gittens**  
Deputy Director of Airports  
Business and Finance  
San Francisco International Airport  
P.O. Box 8097  
San Francisco, CA 94128

**Judy Baar Topinka**  
State Senator – 22nd District  
Illinois State Senate  
8609 W. Cermak Road  
North Riverside, IL 60546

**Jack A. McLean**  
President  
Richfield Truck Stop  
P.O. Box 26 Holy Hill Exit  
US 41-45 State 167 West  
Richfield, WI 53076

**Morton Berlan**  
MIT Information Systems  
77 Massachusetts Ave., E19-738  
Cambridge, MA 02139

**Glenn B. Manishin**  
**Neil S. Ende**  
Blumenfeld & Cohen  
1615 M Street, N.W., Suite 700  
Washington, D.C. 20036  
Attorneys for Gateway Technologies, Inc.

**Charles H. Helein**  
General Counsel  
Helein & Waysdorf, P.C.  
1850 M Street, N.W., Suite 550  
Washington, D.C. 20036  
Attorney for America's Carriers  
Telecommunications Association

**Walt Saprnov**  
**Charles A. Hudak**  
Gerry, Friend & Saprnov  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346-2131  
Attorneys for Interlink Telecommunications, Inc.

**Kenneth F. Melley, Jr.**  
Director of Regulatory Affairs  
U.S. Long Distance, Inc.  
9311 San Pedro, Suite 300  
San Antonio, TX 78216

**Mitchell F. Brecher**  
Donelan, Cleary, Wood & Maser, P.C.  
1275 K Street, N.W., Suite 850  
Washington, D.C. 20005-4078  
Attorney for Oncor Communications, Inc.

**J. Manning Lee**  
 Senior Regulatory Counsel  
 Teleport Communications Group, Inc.  
 2 Teleport Drive  
 Staten Island, NY 10311

**Douglas F. Brent**  
 Associate Counsel  
 9300 Shelbyville Road  
 Suite 700  
 Louisville, KY 40222  
 Attorney for LDDS Communications, Inc.

**Catherine R. Sloan**  
 Vice-President, Federal Affairs  
 1825 I Street, N.W.  
 Suite 400  
 Washington, D.C. 20006  
 Attorney for LDDS Communications, Inc.

**Branson Telephone**  
 P.O. Box 1944  
 Branson, MO 65615

**Gregg C. Sayre**  
 Attorney for Rochester Telephone  
 Corporation  
 180 South Clinton Avenue  
 Rochester, NY 14646

**Anne U. MacClintock**  
 Vice President - Regulatory Affairs  
 & Public Policy  
 The Southern New England Telephone Company  
 227 Church Street  
 New Haven, CT 06510

**James U. Troup**  
 Arter & Hadden  
 1801 K Street, N.W., Suite 400K  
 Washington, D.C. 20006  
 Attorney for Iowa Network Services, Inc.

**David Cosson**  
 National Telephone Cooperative Association  
 2626 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20037

**Edward R. Wholl**  
**William J. Balcerski**  
 New York Telephone Company and  
 New England Telephone and  
 Telegraph Company  
 120 Bloomingdale Road  
 White Plains, NY 10605

**Debra Berlyn, Executive Director**  
 National Association of State Utility  
 Consumer Advocates  
 1133 15th Street, N.W., Suite 575  
 Washington, D.C. 20005

**Kathy L. Shobert**  
 Director, Federal Regulatory Affairs  
 General Communications, Inc.  
 901 15th Street, N.W., Suite 900  
 Washington, D.C. 20005

**William D. Baskett, III**  
**John K. Rose**  
 Frost & Jacobs  
 2500 PNC Center  
 201 East Fifth Street  
 Cincinnati, OH 45202  
 Attorneys for Cincinnati Bell Telephone

**Robert E. Sigmon**  
 Cincinnati Bell Telephone  
 201 E. Fourth Street  
 P.O. Box 2301  
 Cincinnati, OH 45201

Paul J. Berman  
 Alane C. Weizel  
 Covington & Burlig  
 1201 Pennsylvania Avenue, N.W.  
 P.O. Box 7566  
 Washington, D.C. 20044-7566  
 Attorneys for Anchorage Telephone Utility

Bob Schoonmaker  
 Vice President  
 GVNW Inc./Management  
 P.O. Box 25969  
 Colorado Springs, CO 80936

Anthony Marquez  
 First Assistant Attorney General  
 Colorado Public Utilities Commission  
 1580 Logan Street, Office Level 2  
 Denver, CO 80203

Daniel J. Rooks  
 4250 Blackland Drive  
 Marietta, GA 30067

Paul Rodgers, General Counsel  
 Charles D. Gray, Assistant General Counsel  
 James Bradford Ramsay, Deputy Assistant  
 General Counsel  
 National Association of Regulatory Utility  
 Commission  
 1102 ICC Building  
 Post Office Box 684  
 Washington, D.C. 20044

Trudi J. Renwick, Ph.D.  
 Economic Policy Analyst  
 Public Utility Law Project of New York, Inc.  
 Pieter Schuyler Financial Center  
 39 Columbia Street  
 Albany, NY 12207-2717

Eugene F. Mullin  
 Christopher A. Holt  
 Mullin, Rhyne, Emmons and Topel, P.C.  
 1225 Connecticut Avenue, N.W., Suite 300  
 Washington, D.C. 20036-2604  
 Attorneys for Citizens United for  
 Rehabilitation of Errants

Cheryl A. Tritt  
 Morrison & Foerster  
 2000 Pennsylvania Avenue, N.W., Suite 5500  
 Washington, D.C. 20006  
 Attorney for Citizens United for  
 Rehabilitation of Errants

Donald L. Howell, II  
 Deputy Attorney General  
 Idaho Public Utilities Commission  
 472 West Washington Street  
 Boise, ID 83702